

could be returned without any paperwork. Mr. Bielert went on to tell me a number of horror stories about how waffle makers are returned and he showed me one of the waffle makers that I was going to sample that still had remnants of a waffle in it. One final time I asked Mr. Bielert for any paperwork that accompanied the returned waffle makers. He said there was none. I collected the waffle makers and concluded my visit.

While preparing the waffle makers for shipping, I noticed some pieces of tape on the top of one of the waffle makers. The configuration of the tape, and the fact that there were remnants of paper under the tape, appears to indicate that a piece of paper was taped to the top of the waffle maker. I left the tape and paper as I found it. This waffle maker is SUB 2 of sample 99-830-3436.

The 12 waffle makers were split up according to model numbers and sent to Zulma Soto, CRC through the Sample Custodian. The samples are:

99-830-3435	--	Four model 1950	✱Mickey's Waffler.✱
99-830-3436	--	Three model 1550	✱Belgian Waffler.✱
99-830-3437	--	Three model 1600	✱Five-of-Hearts.✱
99-830-3438	--	Two model 1800	✱Classic Waffler.✱

ATTACHMENTS

Assignment

Notice of Inspection

Ed Blythin
SRI, CLE

FIELD ACTIVITY COVERSHEET

1. REGION/STATE FOCR	2. OPERATION (Check One) <input checked="" type="checkbox"/> <i>Inspection</i> <input type="checkbox"/> <i>Establishment Visit</i> <input type="checkbox"/> <i>Telephone Contact</i> <input type="checkbox"/> <i>Investigation</i> <input type="checkbox"/> <i>Other</i> []	3. DATE 4. NUMBER (For RO Use) 971017CCA4659		
5. ESTABLISHMENT Name: [Kadee Products Limited] Address: [6225 Cochran Road] City: [Solon] State: [OH] Zip: [44139] Telephone: [216-519-1400]				
6. RELATED FIRM () <i>Parent</i> () <i>Headquarters</i> () <i>Subsidiary</i> (X) <i>Other Related</i> Name: [Vitantonio Products] City: [Solon] State: [OH]				
7. PRODUCTS COVERED [Waffle irons] []	8. OTHER CONSUMER PRODUCTS [Dishes and pasta makers.] []			
9. ESTABLISHMENT TYPE <input checked="" type="checkbox"/> <i>Manufacturer</i> () <i>Importer</i> <input type="checkbox"/> <i>Wholesaler</i> () <i>Own Label Distributor</i> <input type="checkbox"/> <i>Retailer</i> () <i>Repackager</i> <input type="checkbox"/> <i>Other:</i> []	10. ANNUAL PRODUCTION Product Covered \$7.5 Mil Units: [56,0000] Other Products \$Not det. Units: []			
11. I.S. BUSINESS % Received [Unk]	12. SAMPLES COLLECTED 98-830-4327	<table border="1"> <tr> <td data-bbox="925 1071 1173 1197"> 13. MIS CODE 32600 </td> <td data-bbox="1173 1071 1540 1197"> 14. HOURS Activity [56] Travel [4] </td> </tr> </table>	13. MIS CODE 32600	14. HOURS Activity [56] Travel [4]
13. MIS CODE 32600	14. HOURS Activity [56] Travel [4]			
15. REASON FOR ACTIVITY (Assignment Reference) 971017CCA4659 Assignment from CCA dated 10/17/97.				
16. ANNOUNCED (X) <i>Rationale for Announced Inspection So knowledgeable people would be available.</i> UNANNOUNCED ()				
17. EMPLOYEE'S NAME Ed Blythin	TITLE PSI	SIGNATURE		
18. (X) ENDORSEMENT () <i>REMARKS</i> () <i>SUMMARY</i> () <i>OTHER</i> [] This inspection was conducted at the request of CCA as a F/U to a Section 15 report filed by Kadee Products on 7-16-97 regarding their "Mickey Mouse" waffle iron. They reported that these waffle irons could present an electric shock hazard. The inspection revealed that Kadee Products Limited purchased a bankrupt company named Vitantonio Products in 1995. Vitantonio Products was a manufacturer of a line of electric cooking appliances including waffle makers. After the purchase, Kadee continued to manufacture these products which included what they call their Premier line of waffle (cont'd)				
19. REVIEWER'S NAME John R. Vece	TITLE S.P.S.I.	SIGNATURE		
20. REVIEW DATE 11-19-97	21. DISTRIBUTION O: FOCR; CC: CCA, Z. SOTO.			

ENDORSEMENT CONTINUED:

irons. The Premier line consists of the Mickey Mouse 1950 model and 3 other models of waffle irons, the 1550, 1600, and 1800. All of the models in the firm's Premier line of waffle makers share the same wiring design. The Mickey Mouse, 1950 model, waffle iron has been made since 1992 and its design has not changed since its inception. Since taking over Vitantonio Products, Kadee Products has made 21,995 model 1950 waffle makers, 65,285 model 1550 waffle makers, 25,361 model 1600 waffle makers, and 31,818 model 1800 waffle makers. The waffle makers are UL listed.

Kadee stated that they first learned of the potential problem with their Mickey Mouse Waffle Maker on 5-8-97 when Disney Company officials advised them that they had found a defect in the wiring of 2 of the waffle makers. The defect involved mis-routing of the waffle maker wiring so the it could become abraded by contact with the sharp edges of the waffle maker cover during opening and closing. This in turn could lead to the electrically charged bare wire coming in contact with the body of the waffle maker.

The firm stated that after receiving the report from Disney they examined their stock of waffle makers. This included 725 units of the same lot that the defective 1950 model units were in and 942 units from lots manufactured before and after the defective unit lot. In their Section 15 report and initially during our inspection Kadee stated that all of these 942 waffle makers were model 1950 units. After repeated questioning by our investigator, Kadee admitted that these 942 units included both 1950 and 1600 models. Kadee stated that this examination found no defective units meaning none had abraded wiring. However, review of the firm's records of this examination found that a number of the examined units were found to have the metal clips that are to protect the wiring in the wrong place or the wiring itself in the wrong place.

The firm stated that other than the Disney report, they have received no safety related complaints on their waffle makers. They also stated that there have been no insurance claims or lawsuits involving them.

A sample, 98-830-4327, consisting of 2 of the firm's waffle makers was collected.

F/U: REFER TO CCA.

EIR 10/27 & 11/4/1997

Kadee Products Limited
6225 Cochran Road
Solon, OH 44139

SUMMARY OF FINDINGS

This inspection of Kadee Products, Ltd. (hereinafter Kadee) was conducted in response to an inspection request from Zulma Soto, CCA. The assignment (971017CCA4659, Exhibit #1) asks that Kadee be inspected to obtain information about a "Mickey Mouse" waffle iron manufactured by the firm. Kadee had submitted a Section 15 report concerning two of the waffle irons that were discovered to have abraded wires that presented an electrocution hazard.

The inspection disclosed that the wiring problem with the waffle irons is more widespread than the firm originally reported. Records obtained from Kadee indicated that management at Kadee knew of widespread wiring problems on Kadee waffle irons when they filed a Section 15 report on two defective waffle irons on July 16, 1997. Kadee reports that the only safety-related complaints they have ever received about the Mickey Mouse waffle iron were the complaints covered in the Section 15 report submitted by the firm. Additionally, Kadee reports that there have been no lawsuits related to waffle irons and no insurance claims have been paid regarding Kadee waffle irons.

Sample 98-830-4327 consisting of two waffle irons was collected.

STRUCTURE AND TYPE OF BUSINESS

Kadee has an automotive and a consumer products division. The consumer division consists of Vitantonio Products and a catalog business that sells dishes. Vitantonio manufacturers a line of waffle makers, pizzelle makers, griddles, krumkake makers and pasta makers under the Vitantonio name. Catalog pages for these products are attached to this report as Exhibit #2.

The automotive division, Kadee Metalfab, fabricates aluminum components for the automotive industry.

In addition to the site of this inspection, Kadee also operates a warehouse located at 160 Northfield Road, Bedford, OH 44146.

Kadee purchased Vitantonio Products in 1995. Vitantonio had been located in Eastlake, OH and went bankrupt.

I discussed the corporate structure of Kadee on several different occasions with Mr. George Bielert. He wasn't very clear about the corporate structure. Combining information from Mr. Bielert and the state of Ohio this appears to be the corporate status of Kadee. Kadee and Vitantonio are "Limited Liability Corporations" incorporated in Ohio in 1995. (Mr. Bielert told me Vitantonio was a "division of Kadee.") The office

of the Secretary of State for Ohio reports that Kadee is a corporation in good standing that was incorporated in Ohio on 6/29/95. The charter number of the corporation is 910220. The Secretary's office also reports that Vitantonio is also an Ohio corporation in good standing that was incorporated on 6/29/95. Vitantonio's charter number is 909009. Neither firm has corporate officers listed with the state because they are limited liability corporations and that type of corporation does not have to list the corporate officers.

Mr. Bielert reports that the corporate officers of Kadee and Vitantonio are:

H.C. Kassigkeit - President/Treasurer
George Bielert - Vice President/Secretary

INDIVIDUAL RESPONSIBILITY - PERSONS INTERVIEWED

This inspection was done by appointment with Mr. George Bielert. On 10/27/97 credentials were shown and a Notice of Inspection was issued to Mr. George Bielert, Vice President, Kadee. Also present during the entire inspection was Mr. Brian Bianchi, Process Engineer, Kadee. Finally, Mr. Hank Oberle, Sales Manager was consulted at the end of the inspection to provide sales information. All information in this report was received from or at the direction of the above-mentioned persons.

Mr. Bielert's duties include management of the manufacturing, engineering and quality control departments for Kadee and Vitantonio. Mr. Oberle is in charge of sales and distribution for Vitantonio.

COMPLIANCE HISTORY

This was the first inspection of Kadee by CPSC.

THE PROBLEM/DEFECT

On July 16, 1997 Kadee filed a "Full Report of Substantial Product Hazard." (See Exhibit #3.) This report concerned two Mickey Mouse waffle irons, model #1950, manufactured by Vitantonio. Mr. Bielert reports that two of these waffle makers had been returned from Disney facilities in California and Florida because of defective wiring that presented an electrocution hazard. The defect involved the routing of wiring under metal clips that fit over the sharp edges of a cover of the waffle iron. If the wires aren't routed under these metal clips, the wires become abraded as the waffle iron is repeatedly opened and closed. The abraded wires then come in contact with the body of the waffle maker and present the possibility of a shock hazard.

Mr. Bielert said he first learned of this problem when he had a conference call with Disney officials on 5/8/97. Disney officials on the call were Leeton Lee, California (818-567-5430) and Al Kaufman, Florida.

ACTIONS TAKEN BY KADEE/VITANTONIO

During discussions on 5/8/97 with Disney Director of Technical Services Mr. Al Kaufman, Mr. Bielert learned that he was required to report this wiring defect to CPSC. Mr. Bielert had never heard of CPSC, so he went on the internet and paid some company for CPSC regulations outlining Section 15 reporting requirements and filed the above-mentioned Section 15 Report. Additionally, during my inspection of 10/27/97, Mr. Bielert said that he took the following steps in regard to this matter.

Mr. Bielert said that prior to filing the Section 15 report he had all of the stock of #1950 waffle irons examined to determine if the wires were abraded. He said this examination disclosed that none of the #1950 waffle makers exhibited abraded wires. The waffle irons Mr. Bielert examined included 725 units from the lot that the Disney waffle irons were in and an additional 942 units from lots manufactured before and after the Disney lot. (This information also appears in the Section 15 report.)

Mr. Bielert said he then sent out a news release. A copy of that news release is attached to this report as Exhibit #4. Attached to this report as Exhibit #5 is a mailing list showing where the press release was sent.

These were the actions taken by Kadee as reported to me during my inspection of 10/27/97. During my inspection of 11/4/97, this information changed.

DISCUSSION OF PROBLEM

I asked Mr. Bielert if there was any relationship between where the press release was sent and who purchased the waffle irons in question. Mr. Bielert said there was no such relationship. The mailing list is simply a list of magazines, etc. that Vitantonio would send a press release if they were, for example, marketing a new, improved waffle iron.

I asked Mr. Bielert if he kept any records relating to his examination of the #1950 waffle irons in stock. Mr. Bielert said he did have these records. He went into his office and returned with the three pages attached to this report as Exhibit #6. These three pages are the forms used in the returned-goods department for products that are returned for any reason. (The form is titled VITANTONIO MANUFACTURING RETURN/REPAIR FORM and it is discussed in "COMPLAINTS" section below.) Appearing on these three pages are the serial numbers of waffle irons that

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were examined.

The first question I asked Mr. Bielert regarding this document concerned the date of 5/7/97 that appears on the top of each page. His Section 15 report states that Kadee first learned of the problem on 5/8/97. Therefore, he was examining waffle irons one day before he learned of the problem. Mr. Bielert said the date on the forms must have been incorrect.

I then asked Mr. Bielert what the handwriting at the top of each page meant. On two of the pages appears "Spacers on 1600NS moved over 1/4 inch" and "only 1/2 the order." On the third page appears "1600NS spacers." Mr. Bielert took the documents back and looked at them and said he didn't know what the writing meant. He then placed these documents under a pile of papers he had and he started talking about something else. After Mr. Bielert stopped talking, I asked him if he would give me copies of the documents he had taken back. Mr. Bielert shuffled through his documents and said he didn't know what I was talking about. I told him the documents I was interested in were on the bottom of his pile of documents. Mr. Bielert retrieved the documents and supplied me with copies of same.

Once again, I asked Mr. Bielert about the handwriting on the tops of these documents. He said he didn't know what it meant because these documents represented records for examining #1950 waffle makers. He then took me out to the production line where we talked to a supervisor about the documents. The supervisor repeated what Mr. Bielert had said about the documents. At that point I dropped the matter.

I asked Mr. Bielert what constituted a "lot" and why he thought the problem was limited to one lot. Mr. Bielert said a lot represented the number of units manufactured during a specific time period. These lots can be identified with the serial number. Two of the defective units exhibited serial numbers 17002649 and 17002694. In these numbers the first digit represents the quarter of the year in which the lot was manufactured. The second digit represents the year, e.g., 7 = 1997. The remaining six digits are a sequential number representing the number of units manufactured. Therefore, 17002649 means that the waffle maker was manufactured in the first quarter of 1997 and it was the 2,649 one manufactured that year. If a second lot was manufactured in the same quarter, the first two digits would be the same as the first lot and remaining sequential number would be started where the last lot ended.

Mr. Bielert said he thought the problem was limited to the two defective units because they examined 725 units in stock and 107 units returned from Disney and they didn't discover any additional defective units. Furthermore, 942 units of stock from previous and following lots were examine and no defective units were found. The examination consisted of removing components until the wiring running under the clips was exposed. The wires were then examined to make sure they ran under the clips. The unit was then put back together.

I asked Mr. Bielert if he could explain how this defect (wires not under clips) occurred. Mr. Bielert said he did not have an explanation for what happened. I went to the production line to view how the waffle makers are assembled. To ensure that the rounded clips are put in the right place on the sharp edge of the covers, production workers use what is referred to as jigs and fixtures. When a cover is placed over one of these jig/fixture devices, various protrusions on the jig/fixture force the worker to place the clips in the proper place. Photos of a jig/fixture are attached to this report as Exhibit #7. After the clips are installed on the covers, the covers are placed in a bin of stocked lids that are then used on the production line. On the production line the lids are placed on the waffle maker and the person who does this routes the wires under the clips. I suggested to Mr. Bielert that this worker could make a mistake and not route the wires under the clips. Mr. Bielert said that any problems would be found when they run the waffle maker through an electrical test at the end of the production line. I asked Mr. Bielert how the test could detect an abraded wire if the wire wouldn't be abraded until the waffle iron was repeatedly opened and closed. (It appears as if the abraded wire would result when the wires are not routed under the clips and, consequently, the wire repeatedly rubs back and forth on the sharp edge of the cover.) Mr. Bielert admitted that the electrical testing would not necessarily detect a wire that is not routed under a clip. Consequently, the defect could occur if the wire isn't properly routed during assembly of the waffle iron and none of the assembly personnel notice the problem.

As further evidence that this was an isolated incident, Mr. Bielert said Kadee had never received a similar complaint about the waffle maker and, in fact, they had never received any safety-related complaints about the waffle maker.

Mr. Bielert concluded that this was an instance where a production worker didn't route the wires under the clips when the lid was being assembled. He said the fix to this problem was to assemble the waffle maker properly.

PRODUCT HISTORY

The Mickey Mouse waffle maker has been manufactured since 1992 using the same design, according to Mr. Bielert. Attached to this report as Exhibit #8 is a UL Report from 1992 covering, among others, the model 1950 (Mickey Mouse) waffle maker. According to Mr. Bielert, everything in the 1950 waffle iron is the same as shown in the 1992 UL Report.

Mr. Bielert reports that no design changes have been made on the model #1950 waffle maker since 1992. From 1995, when Kadee purchased Vitantonio, until November of 1997, Vitantonio manufactured 21,995 model 1950 waffle irons. During that same period, Vitantonio has manufactured 65,285 model 1550 waffle

irons; 25,361 model 1600 waffle irons; and 31,818 model 1800 waffle irons. (See Exhibit #9, production figures received from Mr. Oberle.) The models 1550, 1600 and 1800 are in the "Premier" line of waffle irons and they are wired the same as the model 1950 and they use the same metal clips that fit over the sharp edges of the covers on the waffle irons.

Waffle irons from the lot of model #1950 waffle irons in question were shipped to Disney; Chef's Catalog, Chicago; Dillard's, Arkansas; and Sir LaTabee, Seattle. Approximately 50% went to Disney and 50% went to the other stores.

COMPLAINTS

Safety-related complaints would be routed to Mr. Hank Oberle, President of Vitantonio. He would then evaluate the complaint and if it was a product defect he would pass the complaint along to Mr. Bielert who is in charge of quality control and engineering. Mr. Bielert would then take the appropriate action.

I questioned Mr. Bielert and Mr. Oberle about safety-related complaints and both men said the Disney complaints were the first safety-related complaints that they had received on the Premier line of waffle irons. Neither man knew the name of their insurance carrier or if any claims had been paid. The man with this information was Bob Lasalvia, Controller. Mr. Lasalvia reports that there have been no insurance claims paid or lawsuits regarding the Premier line of waffle irons. Kadee's insurance carrier is Atlantic Mutual Company, 222 West Adams, Chicago, IL 60605.

I visited the returned goods department and observed the procedures followed with returned goods. A lady in that department examines the returned item and determines what was wrong with the item. She then fills out a "VITANTONIO MANUFACTURING RETURN/REPAIR FORM" and makes a determination as to what happens to the item. The item can be returned to stock, reworked, scraped or stored. She then sends the form up to accounting so that the appropriate action can be taken in that department. These forms are then filed in the accounting department. I went through about one half of this file and did not see anything of consequence.

Mr. Oberle reports that Kadee's insurance carrier is Atlantic Mutual Company, 222 West Adams, Chicago, IL 60605.

QUALITY CONTROL

Mr. Bielert, who is in charge of quality control, said Kadee has an extensive quality control program that is set out in a 300 page book. However, quality control as it relates to the waffle irons involves the electrical test (discussed previously)

conducted at the end of the production line. This test would not disclosed mis-routed wires.

The jigs and fixtures used to assemble the clips to the covers could also be considered a control on quality. However, during the return inspection on 11/4/97, it was learned that this control wasn't working.

Finally, I did not see any records being kept that related to quality control.

Mr. Bielert said Vitantonio subscribes to the UL service where unannounced inspections are conducted by UL. I asked if he had ever received a Variation Notice from one of these inspections. He said he never received any of these notices.

SEQUENCE OF EVENTS

I asked Mr. Bielert to give me the dates that the various events occurred. He said he first learned of the problem right around the day that he reported it to the Commission. (His Section 15 report is dated July 16, 1997.) This, obviously, wasn't correct since he reported in his Section 15 report that he learned of the problem on 5/8/97. He then said he learned of the problem on 5/8/97, during discussions with the Disney people. I asked him again about the date of 5/7/97 that appears of the previously discussed forms. (Exhibit #6) Once again he said the date on these forms (Exhibit #6) was wrong.

So, at the end of my 10/27/97 inspection the sequence of events, as described to me by Mr. Bielert, was as follows:

May 8, 1997 -- first learned of problem during "conference" call with Disney officials. Mr. Bielert said he also learned of his reporting responsibilities during this call.

After May 8, 1997 -- Date unknown -- Returned goods and stock of #1950 waffle irons were examined.

After May 8, 1997 -- Date unknown -- Mr. Bielert went on internet and obtained CPSC Section 15 reporting requirements. He said he paid \$250 for this information. I have requested a copy of the invoice covering this transaction.

July 8, 1997 -- News release issued. (Exhibit #4)

July 16, 1997 -- Section 15 report made. (Exhibit #3)

RETURN INSPECTION -- 11/4/97

After reviewing information obtained during the 10/27/97, I scheduled another inspection with Mr. Bielert. Additionally, CCA requested that a sample of the waffle irons be collected.

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On 11/4/97, by appointment, I returned to Kadee and issued Mr. Bielert a Notice of Inspection. He had to leave for a couple of hours, so he had Mr. Oberle and Mr. Bianchi answer my questions and help me collect the sample. Mr. Bianchi helped me collect the sample and Mr. Oberle answered a number of additional questions I had about Kadee/Vitantonio operations.

When Mr. Bielert returned, I asked him again to explain the comments on the top of Exhibit #6. I told him that these documents appeared to cover the examination of model #1600NS waffle irons. Also, I told him that it appeared to me that some sort of adjustment was made on these irons. At this point Mr. Bielert handed me a notebook and told me that this was the book that he had showed me during my first inspection and in it were the serial numbers of all of the waffle irons that had been examined. I told Mr. Bielert that I hadn't seen this notebook before and asked what he meant by "all of the waffle irons that had been examined." Mr. Bielert said they examined all of the "Premier" line of waffle irons in stock, when they learned of the Disney problem. (The "Premier line includes models 1550, 1600, 1800 & 1950.) A brief examination of the notebook disclosed that each page listed about 40 serial numbers. Following the column of serial number are four additional columns with the following headings: "Clip Correct, Clip Not Cor, Wire Correct, Wire Not Cor." Additionally, to the left of the column of serial numbers is a column with a date at the top of the column and, in one instance, a model number. A brief examination of these records indicated that the problem of having the clips in the wrong place was extensive and, to a lesser degree, wires were in the wrong place. I asked for copies of these records and Mr. Bielert had an employee copy the notebook for me. See Exhibit #10.

According to Mr. Bielert, Exhibit #10 represents the records for all of the model #1950 waffle irons that were examined. Exhibit #6 represents the records for the model #1600 waffle irons that were examined. No other waffle irons in the Premier line were in stock when the Disney problem surfaced, according to Mr. Bielert.

On 11/17/97 I phoned Mr. Bielert and asked him if he thought the problems he discovered on the waffle irons he examined in stock, could also exist on waffle irons that had been distributed. Mr. Bielert said he didn't think this was possible because he hadn't received any other complaints.

I also asked Mr. Bielert what happened to the third waffle iron that Disney had tested. (Originally, Mr. Bielert had referred to this waffle iron as the one with "the broken foot." This waffle iron apparently did have a broken foot, but Disney had it tested and it failed the "...dielectric voltage withstand testing per UL 1026..." See Exhibit #11.) Mr. Bielert said he had no idea what happened to that waffle iron.

I asked Mr. Bielert if he knew what caused so many clips to be out of place (See Exhibit #10) if the jigs and fixtures were being used to put the clips on the covers. Mr. Bielert said he

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didn't know, but he speculated that maybe employees were taking the lids out of the jigs to complete the installation of the clips because the clips are hard to push on the covers.

Finally, I asked Mr. Bielert if he found the internet bill for access to CPSC regulations. Mr. Bielert faxed me the document attached to this report as Exhibit #12. This document, along with his conversations with Disney officials, shows that Mr. Bielert should have know of his Section 15 reporting requirements on/about 5/8/97. However, he didn't file the Section 15 report until July 15, 1997 and the report did not include all of the information on defective products that Mr. Bielert had knowledge of in May, 1997.

SECOND PROBLEM

Mr. Bielert sent in two 1950 waffle irons (I don't know the date, but assume it was after his Section 15 report.) to Zulma Soto, CCA. One waffle iron had mis-routed wires and the other had wires routed properly. These waffle irons were examined by LSE and the report is attached as Exhibit #13. The report, as I understand it, confirms that the waffle iron with the mis-routed wires is a problem. On the waffle iron with the subject wire properly routed it was confirmed that this wire would not abrade. However, an examination of another wire (not the subject wire) disclosed that this wire could become abraded and present the same hazard as the original problem.

In discussing this problem with Zulma Soto, Mr. Bielert and Mr. Bianchi there appears to be a lot of confusion about exactly what everyone is talking about. Consequently, I photographed the problem and the fix as explained to me by Mr. Bielert and Mr. Bianchi. Those photos are attached to this report as Exhibit #14.

ATTACHMENTS

1. Assignment.
2. Catalog.
3. Kadee Section 15 Report.
4. Kadee Press Release.
5. Kadee Mailing List.
6. Records For Examination Of Model 1600 Waffle Irons.
7. Photos Of Jigs, Covers And Clips.
8. UL Report.
9. Production Numbers.
10. Records For Examination Of Model 1950 Waffle Irons.
11. Disney Cover Letter And Test Results.
12. Internet Document.
13. CPSC LSE Report.
14. Photos Of Second Problem.
15. NOI 10/27/97.

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Kadee Products Limited

Page 10.

16. NOI 11/4/97.

Ed Blythin
Investigator, CLE

FROM FAX NUMBER: 818-558-7483

Date: February 18, 1999

To: Zulma Soto, Compliance Officer, CPSC

Fax No.: (301) 504-0359

From: Leeton Lee

Re: Kadee/Vitantonio's Premier Mickey Waffler

MESSAGE:

Please see attached.

Total number of pages including this page: 3

If you do not receive all of these pages, please call
Trisha Munoz at 818-955-4703 or Leeton Lee at 818-955-
4724. (tie line is 8226)

NOTICE: THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED AND/OR CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS WE WILL PROVIDE YOU.



The Walt Disney Company

Leeton H. Lee
Counsel

February 18, 1999

By Facsimile (301) 504-0359

Deborah Lewis
Trial Attorney
Office of Compliance, Legal Division
U.S. CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

Zulma Soto
Compliance Officer
Office of Compliance
U.S. CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

Re: Kadee/Vitantonio's Premier Mickey Waffler
CPSC # RP970157

Dear Deborah and Zulma:

Thank you for your patience in waiting for the Press Release which is faxed to you along with this letter. The Press Release has been approved by Disney's Corporate Communication Department for release.

Please review the release, and let me know if there are any changes to it. Just know that any material changes must again be approved by our Communications Department, which could delay the release by a week or two, since all of our Corporate Communications people will be attending The Walt Disney Company's Annual Shareholders Meeting next week. Therefore, unless the Commission insists on making any changes, I would prefer that we send the release out to the media as soon as possible. As we would like final approval on any changes made by the Commission, please notify me of any modifications made to the release.

The last issue we need to address is whether the Commission or Disney will be releasing it to the media. Frankly, I have no preference either way so long as the substance of the press release is not changed in any material way. We can discuss this by telephone. Please give me a call if you have any questions or comments.

Zulma, best of luck to you at the DOJ. It has been wonderful working with you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Leeton H. Lee".

Leeton H. Lee
Counsel

Cc: Al Kaufman

DRAFT RELEASE (Rev. 2.18.99)
February XX, 1999

Contact: Chuck Champlin
(818) 567-5959

DISNEY VOLUNTARILY RECALLS MICKEY'S WAFFLE IRONS

BURBANK, Calif. – The Walt Disney Company, in full cooperation with the U.S. Consumer Product Safety Commission ("CPSC"), is recalling 1359 units of an electric waffle iron because of a potential shock hazard to users due to improper wiring installed during the manufacturing process.

The waffle irons were manufactured by Vitantonio Products in October 1996 and January 1997. Vitantonio is a former licensee of Disney Consumer Products and is no longer in business. The CPSC recently contacted Disney to advise the company of its desire to recall the products due to the potential shock hazard. Disney, recognizing the urgency of this problem, and in order to keep its promise to families that they can trust and rely on the Disney brand to provide safe and high-quality products, immediately agreed to cooperate with the CPSC to conduct this recall.

Although no injuries have been attributed to the products, four incidents of minor shock were reported to the CPSC in early 1997. The product is no longer on the market and was sold in late 1996 and early 1997 by retailers in the U.S. and at Walt Disney World Resort at a suggested retail price of \$60 each.

The waffle iron is chrome and black and can be identified by a metallic label on the top of the handle which says "Vitantonio's Premier MICKEY'S WAFFLER." It is made in a "clam-shell" design, and when the top lid is opened, a Mickey Mouse face is revealed on the round, inner top and bottom cooking surfaces, which measure 7 inches in diameter. Although Vitantonio made a number of other styles of Mickey waffle irons, none of those have the defective wiring, and only the "Premier" model with a "three-prong" power cord and bearing a serial number in the range described below is being recalled. Models made with a standard, "two-prong" plug are not being recalled as there are no safety concerns with these models. The model number of the recalled unit is Model 1950 and can be located on the manufacturer's label affixed to the bottom of the waffle iron. The label displays the Vitantonio company name and logo, Model 1950 and serial number designation.

Only "Premier" Mickey's Wafflers having three-prong plugs bearing a model number of 1950 and a serial number in one of the following ranges are being recalled: 46006022 to 46006524, and 17001000 to 17002661.

Consumers should immediately stop using the Premier Mickey's Waffler. To receive a postage-paid mailer to return your Premier MICKEY'S WAFFLER, or for more information, contact Disney toll-free at (800) 935-2394, 24 hours a day, seven days a week. As Vitantonio is no longer in business, cash refunds will not be given to consumers who return their defective waffle irons. However, as an incentive for consumers to return their recalled waffle irons, and as a goodwill gesture, each consumer who properly returns a Premier Mickey's Waffler under this recall will receive a \$70 Gift Voucher from The Disney Catalog.

The Consumer Product Safety Commission protects the public from the unreasonable risk of injury or death from 15,000 types of consumer products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for more information on CPSC's fax-n-demand service, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270. To order a press release through fax-on-demand, call (301) 504-0051 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information or report product hazards to info@cpsc.gov.

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ARTER & HADDEN LLP
ATTORNEYS AT LAW*founded 1843*Cleveland
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Cleveland, Ohio 44115-1475
216/696-1100 telephone
216/696-2645 facsimileWashington, D.C.
Irvine
Los Angeles
San Diego
San Francisco
Woodland Hills**FAX COVER SHEET****TO:****1) DEBORAH LEWIS**

Office of Compliance/CPSC

2) ZULMA SOTO

Office of Compliance/CPSC

3) ROBERT F. LASALVIA

Kadee Products, Ltd.

4) DAVID I. WILSON

A&H/D.C.

FAX NO.:**301/504-0359****301/504-0359****440/439-2964****202/857-0172****FROM:** Joseph J. Morford**DATE:** 11/4/98**TIME:** 4:45 p.m.**TOTAL NO. OF PAGES:** 3
(including cover page)**CLIENT / MATTER:** 70276/82945**COMMENTS**

*If you have any problems reading this transmission,
please call the above telephone number and ask for the fax operator.*

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ATTORNEYS AT LAW

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Woodland Hills
Affiliated Offices
Brussels, Belgium
Geneva, Switzerland

Direct Dial: (216) 696-7971
Internet Address: dwilson@arterhadden.com

November 4, 1998

VIA FAX -- (301) 504-0359 and U.S. Mail

Deborah Lewis, Esq.
Trial Attorney
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

VIA FAX -- (301) 504-0359 and U.S. Mail

Zulma Soto
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

Re: CPSC RP970157
Kadee Products Ltd./Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Ms. Lewis and Ms. Soto:

It was a pleasure having the opportunity to meet with you yesterday. As we discussed, our client will search for and provide copies of all Underwriters Laboratory follow-up inspections for Premiere Line waffle makers since mid-1996, as well as copies of its latest financial statements.

Our client will also conduct yet another check of their files for any and all records regarding returned units to see if any of the returned units were sent back because they were not working, and/or because of any claimed electrical problem.

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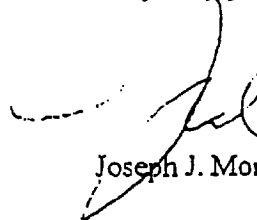
ARTER & HADDEN_{LLP}

Deborah Lewis, Esq.
Zulma Soto
November 4, 1998
Page 2

Finally, they will set aside all returned Premiere Line waffle makers starting today and will continue to do so until further notice. As I confirmed earlier today by telephone with Deborah Lewis, such units will be saved in a box for you to inspect at our facility at your convenience. If a unit is sent back in a show box, the box will be retained with the unit. If a unit is sent back in a miscellaneous box, with other miscellaneous returned Kadee products, the Premiere Line waffle maker will be removed from that package of returns and set aside with any other Premiere Line units received.

If you have any questions, or need to review other materials, please do not hesitate to contact me.

Very truly yours,



Joseph J. Morford

JJM:rac

cc via fax: Robert F. LaSalvia/Kadee Products (440/439-2964)
David I. Wilson, Esq. (202/857-0172)

389017.1
70276/82945

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██████████
6225 COCHRAN ROAD, SOLON, OHIO 44139

██████████
TELEPHONE 440-519-1400; FAX 440-519-1401
██████████

November 9, 1998

Ms. Zulma Soto
Office of Compliance
US Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Subject: UL Inspection reports relating to Premier Units

Herewith transmitted are the documents that you have requested.

Sincerely,
KADEE PRODUCTS, LTD.



George J. Bielert
Executive Vice President



KADEE



Underwriters Laboratories Inc.®

United States Country Code:
(847) 272-8800
FAX No. (847) 272-8129
<http://www.ul.com>

August 31, 1998



Vitantonio Products, Div. of
Kadee Products Ltd.
Mr. E. Vitantonio
6225 Cochran Rd.
Solon, OH 44139

Our Reference: File E78547, Vol. 1

Subject: Follow-Up Services Variation Notice V5898617
Issued August 21, 1998

Dear Mr. Vitantonio:

Our Cleveland UL Inspection Center Representative visited your Bedford factory to perform a Follow-Up Services inspection. During this visit the Representative noted items not in agreement with the Follow-Up Services inspection program. As a result, the subject Variation Notice was issued. A copy is attached for your reference.

The Variation Notice indicates that a response from your company is requested within 15 days. Your comments are needed in order to resolve the Variation Notice.

Please provide us with your written comments on all items. Your reply should be directed to the attention of the undersigned as soon as possible to avoid unnecessary delays in shipping your product with the UL Mark. If you have already responded to UL, please call and tell us to whom your letter was addressed and when it was sent; or

A not-for-profit organization
dedicated to public safety and
committed to quality service

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you can mail or send us a facsimile. Our Follow-Up Services Department fax number is noted below.

Please be aware that as a result of the the Variation Notice, the UL Inspection Center Representative has stated that the subject products bearing the UL Markings must be held at your manufacturing location until the Variation Notice has been resolved and authorization to release the products for shipment has been granted by UL.

Your cooperation in responding to the Variation Notice will be very much appreciated. If you should have any questions or comments regarding the above, please do not hesitate to contact us.

Very Truly Yours,

M. A. Bandemer *HA*

M. A. Bandemer (Ext. 42001)
Senior Engineering Associate
Follow-Up Services Department
FAX: (847) 509-6239

cc: Vitantonio Products, Div. of
Kadee Products Ltd.
Attn: Plant Manager
160 Northfield Rd.
Bedford, OH 44146

REVIEWING OFFICE COPY

8/27 V E 18547
UNDERWRITERS LABORATORIES INC.
 FOLLOW-UP SERVICES-VARIATION NOTICE

Page 1 of 3File No. E 78547Proc. Vol. 1Acct./Order No. R 38259Date Aug 21 1998
(Month-Day-Year)CCN KNURNo. 207829No. 002
(Subscriber)No. 002
(Factory)

(Name of actual individual contacted)

TO: FUS at NBK OfficeFROM: Insp. Center Cleveland No. 165UL Representative G Davis No. 03731Product Category Heaters Cooking Appl. Household.Mfr's Name Vitmaria Prod Div of Kadee ProdFactory Address 160 North Field Rd.Bedford Ohio 44146.

(City, State, Zip Code, Country)

Factory Representative Debbie Markelonis

UL REPRESENTATIVE: GIVE PRODUCT NAME, MODEL NO., CAT. NO., ETC. AND STANDARD OR PROCEDURE REFERENCE (ISSUE/REVISE DATE, VOL., SEC., PAGE, ITEM NOS.) FOR ALL ITEMS LISTED BELOW. SHOW (*) FOR ANY ITEMS CORRECTED AT TIME OF VISIT.

1) Model No. 1550, Vol. 1, Sec. 7, Pg. 1, Iss. Dt. 11-2-92, Re. Dt. 9-23-96, and Sec. Gen. Pg. 5, Iss. Dt. 11-2-92, Re. Dt. 6-2-93, Carton Marking.

Procedure specifies each carton is to be marked with verbiage "Household Use Only". Procedure specifies that letter height is to be $3/16"$ or finish for smallest dimension of carton panel more than $6"$ less than or equal to $10"$. Letter height of "Household Use Only" statement on product carton measured $3/32"$. Smallest dimension of carton panel bearing marking is $6 1/16"$.

2) Vol. 1, Sec. 7, Pg. 1, Iss. Dt. 11-2-92, Re. Dt. 9-23-96, and Sec. Gen. Pg. 5, Iss. Dt. 11-2-92, Re. Dt. 6-2-93, Instruction Manual.

Procedure specifies the statements "Important Safeguards" and "Save These Instructions" are to have a minimum ltr. ht. of $3/16"$. Instruction Manual provided with unit inspected provided with subject statements with letter

INSPECTION SUMMARY

- ☒ Quantity Affected 857 pcs
- ☐ UL Markings Removed;
- ☒ Mfr. Holding Pending Acceptance by FUS; items: 4, 5, 6, 7, 8
- ☒ Temporary Acceptance by G Davis
for item(s) 1, 2, 3; 15 Days
- ☐ Mfr. to Rework Item(s)
- ☐ Add'l Info (Reinspection Dates, etc.)
- ☐ PER Form Issued

AS MANUFACTURER

- ☐ I acknowledge receipt of a copy of this Variation Notice issued by UNDERWRITERS LABORATORIES, INC. Representative, and will forward a copy to the Applicant if other than Manufacturer.

Debbie Markelonis TITLE
 PRINTED NAME
Debbie Markelonis
 (SIGNATURE)

LETTER OF COMMENT FROM APPLICANT

- ☒ Required Within 15 Working Days on Items

1, 2, 3, 4, 5, 6, 7, 8

PLEASE RESPOND TO FOLLOW-UP SERVICES DEPT.

AS APPLICANT

- ☐ I authorize changes as noted in item(s)

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**UNDERWRITERS LABORATORIES INC.
FOLLOW-UP SERVICES-VARIATION NOTICE**

Page 2 of 3File No. E78547Proc. Vol. 1FROM: Insp. Center Cleveland No. 165 Acct./Order No. R 38259Inspector G. Davis No. 03731 Date Aug. 21, 19982) height of $5/32$ " high.

3) Vol. I, Sec. 7, Pg. 1 and App. D, Pg. 1, Iss. Dr. 7-31-73, Re. 12-11-1273
 Dielectric Withstand Test Equipment: Procedure specifies dielectric withstand test equipment to be calibrated at regular intervals (at least annually). Mfr's dielectric withstand test equipment Associated Research Model 4040AT SN: 3942 last calibrated 6-27-97.
 Mfr's rep. replaced subject unit with unit last calibrated 12-

4) Vol. I, Sec. 7, Pg. 3, Iss. Dr. 11-2-92, Re. 8-8-97, item 6, Power Supply Cord and Control Marking: Unit inspected bears the UL Listing Mark. Domestic (US) only. Carton in which product is packaged bears the following marking CUL and UL. Unit / product itself does not bear CUL Mark. In addition procedure specifies product marked with UL / CUL Mark is to be provided with a listed / Certified 3 conductor power supply cord. Unit is provided with $18/2$ power supply cord.

5) Vol. I, Sec. 7, Pg. 8, Iss. Dr. 11-2-92, New 11-4-97, item 2 Handles, and item 3, Control Housing: Procedure specifies subject components are to be molded from R/C plastic (QMFZ2) type Plaslok 506 mfr'd. by Plaslok Corp. No documentation available during inspection identifying / verifying type matl. utilized to mold subject components.

6) Vol. I, Sec. 7, Pg. 8, Iss. Dr. 11-2-92, New 11-4-97, items 4, 5, 6 Feet, Strain Relief Enclosure and Actuator Knob: Procedure specifies subject components to be molded from R/C plastic (QMFZ2) type 04300 mfr'd. by Plastics Eng. Co. Mfr. unable to provide documentation identifying

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UNDERWRITERS LABORATORIES INC.
FOLLOW-UP SERVICES - VARIATION NOTICEPage 3 of 3
File No. E78547
Proc. Vol. 1FROM: Insp. Center Cleveland No. 165 Acct./Order No. R 38259Inspector G. Davis No. 03731 Date Aug. 21, 1988

7) Vol. 1, Sec. 7, Pg. 2, Iss. Dt. 11-2-92, Re. Dt. 5-27-97, item 3,
Pilot Light: Procedure specifies pilot light lens to be
R/C plastic type Lexan 940-A mfrd. by GE Plastics
or Calibre 700-6 mfrd. by Dow Chemical. No documents
available at time of inspection identifying type matl
utilized for subject lens.

8) Vol. 1, Sec. 7, Pg. 2, Iss. Dt. 11-2-92, Re. Dt. 5-27-97, item
Top Enclosure: Procedure specifies when enclosure is
provided with rubber grommet for passage of int. wiring,
subject matl. is to be VC 2495 mfrd. by Vanguard
Prod. Corp. Unit inspected provided with subject
grommet. No material identification available at time of
inspection.



60 Northfield Road • Bedford, Ohio 44143 • Phone: (440) 439-8651 • (800) 732-4444 • Fax: (440) 439-2964

To: Underwriters Laboratories Inc.
From: Vitantonio Products
Date: September 9, 1998
Subj: Response to Variation Notice U5898617
Issued August 21, 1998
Ref: File E78547, Vol. 1

1. Model No. 1550, Vol., 1, Sec. 7, Pg. 1, Iss Dt. 11-2-98, Rev DT 9-23-96, and Sec. GA., Pg. 5, Iss. Dt. 11-2-92, Ra Dt. 6-2-93, Carton Marking: Procedure specifies each carton is to be marked with verbage "Household Use Only". Procedure specifies that letter height is to be 3/16" of an inch for smallest dimension of carton panel more than 6" less than or equal to 10". Letter height of "Household Use Only" statement on product carton measures 3/32". Smallest dimension of carton panel bearing marking is 6-7/16".

Response: Supplier has been notified to change artwork sizing to 3/16" for the letter height of "Household Use Only". Change will be incorporated with the next delivery of cartons.

2. Vol. 1, Sec. 7, Pg. 1, Iss. Dt. 11-2-92, Ra. Dt. 9-23-96, and Sec. Gen. Pg. 5, Iss. Dt. 11-2-92, Rev Dt. 6-2-93, Instruction Manual: Procedure specifies the statement "Important Safeguards" and "Save These Instructions" are to have a minimum ltrr. height of 3/16". Instruction Manual provided with unit inspected provided with subject statements with letter height of 5/32" high.

Response: Instruction Manual artwork is being changed to a height of 3/16" on the verbage, "Important Safeguards" and "Save these Instructions". When new manual is available all current inventory will be obsoleted.

3. Vol. 1, Sec. 7, Pg. 1 and App. D, Pg. 1, Iss. Dt. 7-31-73, Rev. Dt. 11-12-73, Dielectric Withstand Test Equipment: Procedure specifies dielectric withstand test equipment to be calibrated at regular intervals (at least annually). Mfr's dielectric withstand test equipment Associated Research Model 4040AT SN:3942 last calibrated 6-27-97. Mfrs. Rep. Replaced subject unit with unit last calibrated 12-97.

Response: The Dielectric Withstand Test Equipment model 4040AT serial number 3942 was replaced on 8/21/98 with a model 4040AT ID NT7-4 calibrated up to 12-5-98.

4. Vol. 1, Sec. 7, Pg. 3, Iss. Dt. 11-2-92, Rev. Dt. 8-8-97, item 6, Power Supply Cord and Carton Marking: Unit inspected bears the UL Listing Mark Domestic (USL) only. Carton in which product is packaged bears the following marking cUL and UL. Unit /product itself does not bear cUL mark. In addition procedure specifies product marked with UL/cUL Mark is to be provided with a listed/certified 3 conductor power supply cord. Unit is provided with 18/2 power supply cord.

Underwriters Laboratories Inc.

Page 2 of 3

September 9, 1998

Response: All packaging bearing the cUL and UL listing is being reworked to only display the UL mark for shipments in the United States.

5. Vol. 1, Sec. 7 Pg. 8, Iss. Dt. 11-2-92, New 11-4-97, Item 2 Handles, and Item 3, Control Housing: Procedure specifies "subject components are to be molded from R/C plastic (QMFZ2) Type Plaslok 506 mfrd. By Plaslok Corp. No documentation available during inspection identifying/verifying type matl. utilized to mold subject components.

Response: Documentation was obtained from our supplier certifying the raw material Plaslok 506 for the molding of the handles, and 3 items, controlling housing and presented to UL after the in house inspection.

6. Vol. 1, Sec. 7, Pg. 8, Iss. Dt. 11-2-92, New 11-4-97, Items 4, 5, 6 Feet, Strain Relief Enclosure and Activator Knob: Procedure specifies subject components to be molded from R/C plastic (QMFZ2) Type 04300 Mfrd. By Plastics Eng. Co. Mfr. Unable to provide documentation identifying/verifying type material subject components molded from.

Response: Documentation was obtained from our supplier certifying the raw material RC plastic (QMFZ2) Type 04300 for the molding of the feet, strain relief enclosure and activator knob and presented to UL after the inspection.

7. Vol. 1, Sec. 7, Pg. 2, Iss. Dt. 11-2-92, Rev. Dt. 5-27-97, item 3, Pilot Light: Procedure specified pilot light lens to be R/C plastic type Lexan 940-A mfrd. By GE Plastics or Calibre 700-6 mfrd. By Dow Chemical. No documentation available at time of inspection identifying type matl. utilized for subject lens.

Response: Documentation was obtained from our supplier certifying the raw material Lexan 940-A manufactured by GE Plastics or Calibre 700-6 by Dow Chemical for the molding of the pilot lights and presented to UL after the inspection.

8. Vol. 1, Sec. 7, Pg. 2, Iss. Dt. 11-2-92, Rev. Dt. 5-27-97, Item 4 Top Enclosure: Procedure specifies when enclosure is provided with rubber grommet for passage of int. wiring subject matl. is to be VC 2495 mfrd. By Vanguard Prod. Corp. Unit inspected provided with subject grommet. No material identification available at time of inspection.

Underwriters Laboratories Inc.

Page 3 of 3

September 9, 1998

Response: Documentation was obtained from our supplier certifying the raw material VC 2495 manufactured by Vanguard was used in the manufacture of the rubber grommet used in the Top Enclosure, and presented to UL after the inspection.



333 Pfingsten Road
Northbrook, Illinois 60062
United States Country Code
(847) 272-8800
FAX No. (847) 272-8129
<http://www.ul.com>

September 22, 1998



Vitantonio Products, Div Of
Kadee Products LTD
Mr .E. Vitantonio
6225 Cochran Rd
Solon, OH 44139

Our Reference: File E78547, Vol. 1

Subject: Follow-Up Services Variation Notice V5898617
Issued August 21, 1998

Dear Mr. Vitantonio:


The subject Variation Notice and your response of September 9, 1998 have been reviewed by our Follow-Up Services Department. The following is the result of our review of this material.

Based on the comments in your response, Items 1 through 8 will be corrected to comply with the requirements. A copy of your response letter will be forwarded to our Field Representative so that he may review these items again during his next visit.


Based on the above, we are closing this Variation Notice.

Your continued cooperation with our Follow-Up Services Inspection Program is appreciated.

Very Truly Yours,


M. A. Bandemer (Ext. 42001)
Senior Engineering Associate
Follow-Up Services Department
FAX: (847) 509-6239

Reviewed By:


Carnation Ortega
Project Engineer
Follow-Up Services Department

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**UNDERWRITERS LABORATORIES INC.
INSPECTION REPORT - TYPE R SERVICE**

TO: FUS at NORTHBROOK (Reviewing) Eng. Dept. _____ File No. EL23043
 FROM: Insp. Center CLEVELAND Office _____ Proc. Vol. 1
 Inspector GEORGE DAVIS No. 165 Order No. P38248
 Product Category FOOD-PREPARING MACHINES, HOUSEHOLD No. 03731 Date Aug 21, 1998
 Mfr's Name VITANTONIO PRODUCTS, DIV OF CCN IPWZ
KADFF PRODUCTS LTD No. 207829
 Factory Address 160 NORTHFIELD RD (Subscriber) 002
BEDFORD (Street) OH44146 Factory Representative Debbie Markelbuis (Factory)
 (City, State, Zip Code) (Name of actual individual contacted)

NOTE: REPORT ALL INFORMATION CONCERNING APPLICANT/LISTEE/MANUFACTURER NAME CHANGES, OFFICE OR FACTORY ADDRESS CHANGES ON THE SEPARATE FORM ENTITLED "NOTICE OF CHANGE OF SUBSCRIBER STATUS".

***** Nature of Visit	***** Summation	YES	NO
<input checked="" type="checkbox"/> Regular Inspection	Listing/Classification/Recognized Marks (Markings)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> IPI Inspection	Used Since Last Visit	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> Special Inspection	Variation Notice Issued	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Listing/Classification/Recognized Marks (Markings)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Removed		

Product Examined †	1	2	3	4
Type, Style, Cat. or Model No.	<u>No Listed Production Since Last Insp.</u>			
Name of Product	<u>No Stock Available</u>			

† - Circle Type, Style, Cat. or Model designation if product is Multiple Listed/Classified.

If samples are required to be sent to UL Laboratory indicate below. If required samples are not sent explain under Remarks on reverse side.

Type, Style, Cat. Model No.	Name	Sample Tag No.	Shipped To Which Office
<u>/</u>			

CHECK HERE ☐ IF YOU WRITE REMARKS ON REVERSE SIDE.
☐ IF YOU USE DATA SHEET ON REVERSE SIDE OR ATTACH SEPARATE DATA SHEET

 THIS ACKNOWLEDGES THAT THE UL INC. INSPECTOR VISITED THIS LOCATION FOR THE TIME SHOWN AND INSPECTED THE PRODUCT(S) INDICATED.

TIME IN FACTORY 1/4

Sign

Debbie Markelbuis
 (Manufacturer's Representative) (Title)

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UNDERWRITERS LABORATORIES INC.
INSPECTION REPORT - TYPE R SERVICE

Eng. Dept. _____ File No. E78547

TO: FUS at NORTHBROOK Office _____ Proc. Vol. 1
(Reviewing)

FROM: Insp. Center CLEVELAND No. 165 Order No. R38259

Inspector GEORGE DAVIS No. 03731 Date Aug 21, 1998

Product Category HEATERS, COOKING APPLIANCES, HOUSEHOLD CCN KNUR

Mfr's Name VITANTONIO PRODUCTS, DIV OF
KADEE PRODUCTS LTD No. 207829
(Subscriber)

Factory Address 160 NORTHFIELD RD No. 002
(Street) (Factory)

BEDFORD OH44146 Factory Representative Debbie Markelouis
(City, State, Zip Code) (Name of actual individual contacted)

NOTE: REPORT ALL INFORMATION CONCERNING APPLICANT/LISTEE/MANUFACTURER NAME CHANGES, OFFICE OR FACTORY ADDRESS CHANGES ON THE SEPARATE FORM ENTITLED "NOTICE OF CHANGE OF SUBSCRIBER STATUS".

Nature of Visit		Summation	YES	NO
<input checked="" type="checkbox"/>	Regular Inspection	Listing/Classification/Recognized Marks (Markings) Used Since Last Visit	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	IPI Inspection	Variation Notice Issued	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Special Inspection	Listing/Classification/Recognized Marks (Markings) Removed	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Product Examined †	1	2	3	4
Type, Style, Cat. or Model No.	1550			
Name of Product	Hers. Cooking Appliances, Household.			

† - Circle Type, Style, Cat. or Model designation if product is Multiple Listed/Classified.

If samples are required to be sent to ULI Laboratory indicate below. If required samples are not sent explain under Remarks on reverse side.

Type, Style, Cat. Model No.	Name	Sample Tag No.	Shipped To Which Office
1250	Watts Cook Appl.	F 755932	Mel

CHECK HERE ☐ IF YOU WRITE REMARKS ON REVERSE SIDE.
☒ IF YOU USE DATA SHEET ON REVERSE SIDE OR ATTACH SEPARATE DATA SHEET

THIS ACKNOWLEDGES THAT THE UL INC. INSPECTOR VISITED THIS LOCATION FOR THE TIME SHOWN AND INSPECTED THE PRODUCT(S) INDICATED.

TIME IN FACTORY 5 1/2

Sign John T. Beckman
(Manufacturer's Representative) (Title)

**UNDERWRITERS LABORATORIES INC.
INSPECTION REPORT - TYPE R SERVICE**

TO: FUS at NBK (Reviewing) Office _____ File No. E117457
FROM: Insp. Center Cleveland No. 165 Proc. Vol. 1
Inspector G. Davis No. 03731 Order No. R38298
Product Category Commercial Cooking Appl. Date Aug. 21, 1998
Mfr's Name Virtuonia Prod. Div. of Kadec Prod. Ltd. CCN KNGT
Factory Address 160 North Field Rd. No. 207829 (Subscriber)
Bedford Ohio 44146 (City, State, Zip Code) Factory Representative Debbie Markelawis No. 2 (Factory)

NOTE: REPORT ALL INFORMATION CONCERNING APPLICANT/LISTEE/MANUFACTURER NAME CHANGES, OFFICE OR FACTORY ADDRESS CHANGES ON THE SEPARATE FORM ENTITLED "NOTICE OF CHANGE OF SUBSCRIBER STATUS".

Nature of Visit	Summation	YES	NO
<input checked="" type="checkbox"/> Regular Inspection	Listing/Classification/Recognized Marks (Markings) Used Since Last Visit	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> IPI Inspection	Variation Notice Issued	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/> Special Inspection	Listing/Classification/Recognized Marks (Markings) Removed	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Product Examined †	1	2	3	4
Type, Style, Cat. or Model No.	No Listed Prod. Since Last Insp.			
Name of Product	No Stock			

† - Circle Type, Style, Cat. or Model designation if product is Multiple Listed/Classified.

If samples are required to be sent to ULI Laboratory indicate below. If required samples are not sent explain under Remarks on reverse side.

Type, Style, Cat. Model No.	Name	Sample Tag No.	Shipped To Which Office
_____	_____	_____	_____
_____	_____	_____	_____

CHECK HERE ☐ IF YOU WRITE REMARKS ON REVERSE SIDE.
☐ IF YOU USE DATA SHEET ON REVERSE SIDE OR ATTACH SEPARATE DATA SHEET

THIS ACKNOWLEDGES THAT THE UL INC. INSPECTOR VISITED THIS LOCATION FOR THE TIME SHOWN AND INSPECTED THE PRODUCT(S) INDICATED.

TIME IN FACTORY 1/4

Sign Debbie Markelawis (Manufacturer's Representative) (Title)
1168

ARTER & HADDEN_{LLP}
ATTORNEYS AT LAW

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Geneva, Switzerland

Direct Dial: (216) 696-7971
Internet Address: dwilson@arterhadden.com

November 4, 1998

VIA FAX -- (301) 504-0359 and U.S. Mail

~~Deborah Lewis, Esq.
Trial Attorney
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001~~

VIA FAX -- (301) 504-0359 and U.S. Mail

Zulma Soto
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

Re: CPSC RP970157
Kadee Products Ltd./Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Ms. Lewis and Ms. Soto:

It was a pleasure having the opportunity to meet with you yesterday. As we discussed, our client will search for and provide copies of all Underwriters Laboratory follow-up inspections for Premiere Line waffle makers since mid-1996, as well as copies of its latest financial statements.

Our client will also conduct yet another check of their files for any and all records regarding returned units to see if any of the returned units were sent back because they were not working, and/or because of any claimed electrical problem.

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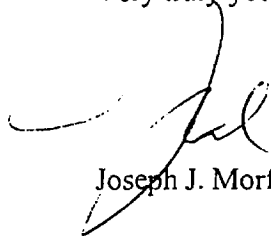
ARTER & HADDEN_{LLP}

Deborah Lewis, Esq.
Zulma Soto
November 4, 1998
Page 2

Finally, they will set aside all returned Premiere Line waffle makers starting today and will continue to do so until further notice. As I confirmed earlier today by telephone with Deborah Lewis, such units will be saved in a box for you to inspect at our facility at your convenience. If a unit is sent back in a show box, the box will be retained with the unit. If a unit is sent back in a miscellaneous box, with other miscellaneous returned Kadee products, the Premiere Line waffle maker will be removed from that package of returns and set aside with any other Premiere Line units received.

If you have any questions, or need to review other materials, please do not hesitate to contact me.

Very truly yours,



Joseph J. Morford

JJM:rae

cc via fax: Robert F. LaSalvia/Kadee Products (440/439-2964)
David I. Wilson, Esq. (202/857-0172)

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70276/82945

170

MODE = MEMORY TRANSMISSION

START=OCT-28 16:38

END=OCT-28 16:43

FILE NO. = 251

STN NO. COM ABBR NO. STATION NAME/TEL.NO. PAGES DURATION

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-CPSC COMPLIANCE -

***** -301 504 0359 - ***** 301 504 0359- *****



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 10/28/98 PAGES TRANSMITTED 1 + cover

TO: Lawrence McClure

TITLE: Esg.

OFFICE: _____

FAX #: 626-795-6321

FROM: Julius Dote

REMARKS: 16 CFR § 1115.13(d)

☐ Confirmation copy to follow by U.S. Mail

☒ Fax Transmission Only

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171



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 10/28/98 PAGES TRANSMITTED 1 + cover

TO: Lawrence McClure

TITLE: Esg.

OFFICE: _____

FAX #: 626-795-6521

FROM: Zulma Dato

REMARKS: 16 CFR § 1115.13(d)

☐ Confirmation copy to follow by U.S. Mail

☒ Fax Transmission Only

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172

ARTER & HADDEN^{LLP}

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November 10, 1998

VIA FAX -- (301) 504-0359 and U.S. Mail

Deborah Lewis, Esq.
Trial Attorney
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

VIA FAX -- (301) 504-0359 and U.S. Mail

Zulma Soto
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

Re: CPSC RP970157
Kadee Products Ltd./Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Ms. Lewis and Ms. Soto:

Enclosed is a copy of preliminary year-end financial statements for Kadee Products, Ltd. September 30, 1998 is the end of the Kadee fiscal year. I believe these statements illustrate the difficulties Kadee is facing, as were described to you at our recent meeting.

As we also discussed at the meeting, and as with all of our prior submissions, pursuant to 16 C.F.R. §1015.18 we request, on behalf of Kadee Products, Ltd., that all information provided with this letter and its attachments, be treated as containing trade secrets and confidential commercial and financial information that is exempt from public disclosure under 5 U.S.C. §552(b)(4). Kadee Products, Ltd. has maintained this information in confidence and has not released it to anyone except its employees or persons in confidential relationships with it, such as

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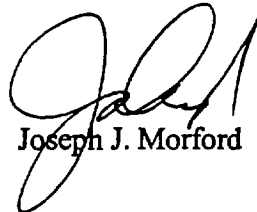
ARTER & HADDEN_{LLP}

Deborah Lewis, Esq.
Zulma Soto
November 10, 1998
Page 2

its attorneys and consultants. This information is not commonly known within the industry and cannot be ascertained by outside persons with a minimum of time and effort. If released, the information will likely cause substantial and irreparable harm to Kadee Products' competitive position. As counsel to Kadee Products, we are authorized to make this claim of confidentiality on its behalf. We appreciate your anticipated cooperation in this regard.

As always, if you have any questions regarding this matter, please do not hesitate to contact me. We anticipate getting the Underwriters Laboratory reports together and to you in the immediate future.

Very truly yours,



Joseph J. Morford

JJM:rae
Enclosures

cc via fax: Robert F. LaSalvia/Kadee Products (440/439-2964)
David I. Wilson, Esq. (202/857-0172)

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70276/82945

174

Kadee Products, Ltd.
 Balance Sheet
 Preliminary Year Ended September 30, 1998
 Dollars

	Sept 30
ASSETS	
Current assets:	
Cash	\$49,164
Accounts receivable	2,340,251
Raw material inventory	301,431
Work in process inventory	
Finished goods inventory	139,388
Prepaid expense	

Total current assets	2,830,234
Tooling, dies,property & equipment	375,293
Less: accumulated depreciation	(291,375)

Tooling, dies,property & equipment,net of depreciation	83,918
Other assets:	
Other assets	12,883

	12,883
Total assets	\$2,927,035
	=====

Kadee Products, Ltd.
Balance Sheet
Preliminary Year Ended September 30, 1998
Dollars

	1998 Sept 30
LIABILITIES AND MEMBER EQUITY	
Current liabilities	
Notes payable - Fifth Third Bank	\$2,438,730
Current portion of long-term debt	76,400
Accounts payable	2,947,695
Bank overdraft payable	0
Accrued expenses	
Commissions	464,338
Deferred credits	
Total current liabilities	<hr/> \$5,927,163
Long-term liabilities	0
Members' Equity	(3,000,128)
Total Liabilities and Members' Equity	<hr/> <hr/> \$2,927,035

Kadee Products, Ltd.
Income Statement
Preliminary Year Ended September 30, 1998
Dollars

	1998 Sept
Net sales	\$6,790,663
Cost of sales	6,341,403
Gross profit	<u>449,260</u>
Selling, General and Administrative Expense	1,146,404
Income from operations	<u>(697,144)</u>
Other Income (Expense)	
Interest expense	(258,856)
Royalty expense - Disney	(107,525)
Amortization of negative goodwill	
Gain of sale of assets	
Insurance claim recovery	
Write off of obsolete & inactive inventory	(514,048)
	<u>(880,429)</u>
Net Income (Loss)	(1,577,573)
Members' Equity at the Beginning of the Period	(1,422,555)
Members' Equity at the End of the Period	<u>(\$3,000,128)</u> =====

Kadee Products, Ltd.
Cost of Goods Sold
Preliminary Year Ended September 30, 1998
Dollars

	1998 Sept
Material	\$4,807,799
Freight	187,520
Factory supplies	41,850
Direct labor	658,225
Rent	81,600
Depreciation	94,474
Indirect labor	71,250
Supervision	62,525
Payroll taxes	65,069
Benefits	104,425
Repair and maintenance	31,900
Utilities	101,120
Discounts	
Customs	22,750
Truck lease	10,896
Applied overhead	0
	<hr/>
	\$6,341,403
	<hr/>

ARTER & HADDEN^{LLP}

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Internet Address: dwilson@arterhadden.com

November 17, 1998

VIA FAX – (301) 504-0359 and U.S. Mail

Deborah Lewis, Esq.
Trial Attorney
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

VIA FAX – (301) 504-0359 and U.S. Mail

Zulma Soto
Office of Compliance
U.S. Consumer Product Safety Commission
Washington, D.C. 20207-0001

Re: CPSC RP970157
Kadee Products Ltd./Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Ms. Lewis and Ms. Soto:

I understand that under a November 9, 1998 cover letter, George J. Bielert of Kadee Products, Ltd., forwarded to you various UL inspection reports relating to Premiere units. These materials were provided in response to your recent request.

While Mr. Bielert's cover letter did not specifically cover confidentiality, we assume that as with all of our prior submissions, pursuant to 16 C.F.R. §1015.18, all information provided by Mr. Bielert in his November 9, 1998 letter, and its attachments, will be treated as containing trade secrets and confidential commercial and financial information that is exempt from public disclosure under 5 U.S.C. §552(b)(4). Kadee Products, Ltd. has maintained this information in confidence and has not released it to anyone except its employees or persons in confidential

ARTER & HADDEN_{LLP}

Deborah Lewis, Esq.
Zulma Soto
November 17, 1998
Page 2

relationships with it, such as its attorneys and consultants. If released, the information will likely cause substantial and irreparable harm to Kadee Products' competitive position. As counsel to Kadee Products, I have been authorized to make this claim of confidentiality for the materials previously provided. Your anticipated cooperation in this regard is appreciated.

We look forward to hearing from you about a potential resolution and closing of this investigation. Please free to contact Dave Wilson or me at any time.

Very truly yours,



Joseph J. Morford

JJM:rae

cc via fax: Hank C. Oberle (440/439-2964)
David I. Wilson, Esq. (202/857-0172)

391522.1
70276/82945

180



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Division of Administrative Litigation

Deborah Lewis
Trial Attorney
Tel: (301) 504-0626, Ext. 1357
Fax: (301) 504-0359

August 13, 1998

VIA FAX AND MAIL

David Wilson
Arter & Hadden
1801 K. St., N.W., Suite 400K
Washington, DC. 20006-1301

RE: Kadee/Vitantonio Waffle Makers
CPSC RP970157

Dear Mr. Wilson,

This is to confirm our telephone conversation of this morning, in which we asked for and you agreed to provide the following information:

1. The format of the diskettes that you provided along with the letter of August 6. As we told you, we are unable to read the information on the diskettes.
2. A breakdown of the number of 1950 and 1950c wafflers manufactured and sold. The sales history and numbers sold that you provided group the two models together.
3. The number of 1950c wafflers sold to Disney and whether any were sold to other American retailers. If 1950cs were sold to other American retailers, please provide the names and addresses for those other retailers.
4. A clarification of the source of the discovery of the two defective units sold to Disney. In its original report to the CPSC, Kadee stated that the units were discovered through Disney's own independent testing. In your letters of June 15 and August 6, you stated that the problems were reported by consumers. If, in fact, consumers discovered the problem, please provide us with the names and addresses of the consumers and any documents associated with their complaints.

5. The years corresponding to the months at the top of the computer printout of the inventory sales history.
6. What does "QTY PRYR" on the inventory sales history refer to?
7. Do the number of sales listed on the inventory sales history equal the number of sales listed separately on the Sales History?
8. A clarification of the list of 33 retailers provided to the staff on May 18, 1998. As we discussed, this is significantly fewer than the number of retailers provided to the staff on August 6. What is the significance of the 33 retailers?

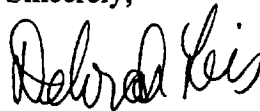
You confirmed in our telephone conversation that the 1950c wafflers were manufactured only between January 14 and January 17, 1997 and then again after July, 1998. No 1950c wafflers were manufactured before January 14, 1997 or between January 17, 1997 and July, 1998.

Enclosed is the document that was faxed by Zulma Soto to George Bielert on September 30, 1997, describing the defect found by our staff in the "fix" provided by Kadee. Also enclosed is the fax cover sheet for that document.

Finally, this is to confirm that the staff of the CPSC cannot agree to your request to get prior written approval from Kadee before contacting retailers in the course of this investigation. You said that you understood that the staff has the authority to contact retailers without the prior written approval of Kadee.

Thank you very much for your continuing cooperation. Please feel free to contact me or Zulma Soto if you have any questions.

Sincerely,



Deborah Lewis

***** -CC JOURNAL- ***** DATE SEP-30 1997 ***** TIME 16:21 *** P.01

MODE = MEMORY TRANSMISSION

START=SEP-30 16:20

END=SEP-30 16:21

FILE NO. = 199

STN NO.	COM	ABBR NO.	STATION NAME/TEL.NO.	PAGES	DURATION
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-CPSC COMPLIANCE -

***** -301 504 0359 - ***** - 301 504 0359- *****

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

Tel: 301-504-0608

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

DATE: 9/30/97 PAGES TRANSMITTED 1 + cover

TO: George Bielert

TITLE: Vice President

OFFICE: _____

FAX #: 216-519-1401

FROM: Zulema Soto

REMARKS: As per your request, enclosed
find a discussion of our examination
of the samples you provided. Please call me tomorrow
to discuss.

☐ Confirmation copy to follow by U.S. Mail

☒ Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

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Discussion

The sample sent from G. Bielert with the words, "Wire routed under cover edge, not under protector clip" was opened and examined. The location of the mis-routed wire does not protect it from abrasions. If the insulation becomes nicked or scraped due to its improper location, the abrasion could allow line voltage to energize the entire surface of the waffle iron if it is not plugged into a properly grounded receptacle. If the product is being used with a "cheater" plug or in a home without a ground plug there is a possibility of an electrocution if a consumer touched the product and a grounded surface. The surface of the waffle iron is made of all metal and the entire product would become energized if it is not plugged into a properly grounded receptacle.

An examination of the "fix" sent by G. Bielert with the words, "Confirming wiring routing under clip" was opened and examined. The wire in question with the initial sample was properly routed and an abrasion would not occur. However, the sample was opened and another wire, directly from the hot conductor of the cord to the heating element, was found mis-routed between two metal surfaces. Microscopic examination shows that the insulation deteriorated and the line conductor came in contact with the surface of the waffle iron and an arc developed. A similar hazard scenario exists if the insulation became nicked and the line conductor came in contact with surface as with the other mis-routed wire.

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Division of Administrative Litigation

Deborah Lewis
Trial Attorney
Tel: (301) 504-0626, Ext. 1357
Fax: (301) 504-0359

July 23, 1998

VIA FAX AND MAIL

David Wilson
Arter & Hadden
1801 K. St., N.W., Suite 400K
Washington, DC. 20006-1301

RE: Kadee/Vitantonio Waffle Makers
CPSC RP970157

Dear Mr. Wilson,

On June 15, we received the "report" you filed on behalf of Kadee Products Limited concerning their waffle irons. That "report" did not contain most of the information required by 16 C.F.R. § 1115.13(d) and requested in the letter from Carlos Perez, Associate Director of the Recalls and Compliance Division of the U.S. Consumer Product Safety Commission, to George Bielert of Kadee dated May 4, 1998. I am enclosing a copy of that letter.

Some of the information requested but not received includes copies of all complaints, claims injuries or safety communications, from consumers or dealers, concerning the product and copies of engineering drawings and engineering change notices.

Much of the information that was provided is very confusing. It is not clear how many units of each model were manufactured, during what dates, and what has become of those units. There is some information about units in a particular lot, with no explanation of why that lot is chosen and how it is distinguished from other lots. Please provide us with information on the total number of products manufactured. If there is a reason to focus on a particular lot, please explain that reason and provide the information on that lot as well.

The chronology of events raises several questions. You state that in response to a request from our staff for samples of the product, "Kadee provided one Model 1950 unit which it

intentionally rigged . . ." What do you mean that the product was "intentionally rigged"? The chronology refers to quality control changes that were implemented in September, 1997. Please provide us with all documents relating to those changes, the number of units manufactured before that date and after, and an explanation of how those units can be distinguished (such as date codes). There is a great deal of confusion in the chronology about what models were involved in different actions. For example, the May, 1998 entry states that the models provided to Disney were 1950Cs and not, as originally thought, 1950s. In the October, 1997 entry, there is a reference to units being provided to CPSC without identifying whether the units were 1950s or 1950Cs. Please provide a chronology that identifies and distinguishes between events involving the Model 1950s and the Model 1950Cs. In addition, please explain why Canadian models were shipped to Disney and American retailers.

In the letter dated May 4, 1998, our staff requested "copies of all test reports, analysis and evaluations, including premarket tests and reports of tests and analyses related to the problem, including the date and place such tests and analyses were conducted by or on behalf of the firm and the identity of the persons involved in the testing and analyses." Kadee did not provide these requested materials but rather provided an abbreviated synopsis of its testing. This synopsis raises additional questions. When were the described tests conducted? Since the document states the tests were conducted in order to see if the "Disney problem" was present, it appears they were all conducted after Disney reported its defective waffle irons. Were any tests of any kind conducted before the discovery of the "Disney problem"?

The Return/Repair Forms contain the notation "moved over ¼ inch." Is that the only defect that Kadee examined the units for? How many were found with this defect? Please explain the additional Return/Repair Forms that were attached to your June 15, 1998 letter that do not contain these notations.

Please provide us with the names and addresses of all distributors, retailers and purchasers of the waffle irons, including consumers. Please be specific about the model number when providing this information.

Finally, Kadee has not proposed a corrective action plan. As you know, the staff has made a preliminary determination that the waffle irons present a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Commission (CPSC), 15 U.S.C. § 2064(a). Kadee has not provided information that would undermine that determination nor has the company proposed a plan to protect consumers from the hazards posed by the defective waffle irons.

In short, the "report" provided on June 15, 1998 is inadequate. It does not provide the information necessary for our staff to evaluate the problem and work with Kadee to resolve it. Please provide the information required by 16 C.F.R. § 1115.13(d), and requested in the letter from Carlos Perez dated May 4, 1998 and this letter within the next ten (10) working days. If we do not receive this information, we will have to explore other legal options. We would much prefer to work with you.

Please provide the information to Zulma Soto, office of Compliance, U.S. Consumer Product Safety Commission, Washington, DC 20207-0001. For other delivery services, please address the materials to: Zulma Soto, Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East-West Highway, Bethesda, MD 20814-4408.

Please feel free to call me or Zulma Soto if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deborah Lewis".

Deborah Lewis



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**U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207**

FILE COPY

OFFICE OF COMPLIANCE
Recalls and Compliance Division
Email: cperez@cpsc.gov

Carlos L. Perez
Associate Director
Tel: 301-504-0400, Ext. 2338
Fax: 301-504-0359

HAND DELIVERED ON MAY 4, 1998

George J. Bielert, Vice President
Kadee Products Limited
6225 Cochran Road
Solon, OH 44139

Re: CPSC RP970157
Kadee Products Limited/Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Mr. Bielert:

The staff of the Office of Compliance of the U.S. Consumer Product Safety Commission (Commission) has reviewed the available information concerning the above-mentioned case.

After careful consideration and in accordance with 16 C.F.R. § 1115.12(a), the Compliance staff has made a preliminary determination that all Kadee and/or Vitantonio waffle makers present a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a). Specifically, the waffle makers may have mis-routed electrical wires and/or incorrectly installed metal clips resulting in abraded wires due to the sharp edge of the shell. If the abraded wires come in contact with the shell or body of the waffle maker, it presents a potential shock or electrocution hazard.

The staff welcomes and will give full consideration to any comments or additional information from the firm concerning its preliminary determination. The staff will meet with the firm as necessary to discuss its comments or corrective action.

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Voluntary Corrective Actions

In view of the substantial risk of injury presented to consumers by waffle irons with mis-routed wires and/or incorrectly installed metal clips, we request that you immediately stop production and distribution of the waffle irons. Additionally, the staff requests that the firm take voluntary action to notify consumers and to recall or correct potentially hazardous products which are in the chain of distribution and in the possession of consumers. If the firm agrees to take voluntary corrective action, please submit a written corrective action plan describing the actions which it plans to take. Section 1115.20(a) of the regulations on Substantial Product Hazard Reports, 16 C.F.R. § 1115.20(a), outlines the elements of an appropriate corrective action plan. The staff has also enclosed examples of recall actions taken by firms that the firm may find useful. The staff will review the firm's plan promptly and discuss with it any suggestions it has or additional measures it believes Kadee Products Limited/Vitantonio Products should take.

Additionally, rather than the Commission unilaterally issuing a press release and video news release, the staff believes it would be appropriate for the firm and the Commission to issue a joint press release and video news release announcing the recall. The staff will work with the firm to develop and issue a mutually acceptable release.

A voluntary corrective action plan must include an agreement that the Commission may publicize the terms of the plan and inform the public of the nature and the extent of the alleged substantial product hazard. Please read carefully the enclosed document on "Information Disclosure" dated May 12, 1983. This document discusses the statutes and regulations which govern the Commission's disclosure of information and explains Commission staff's policy on the disclosure of information concerning product recalls and similar actions.

When the corrective action program begins, the Office of Compliance will monitor the progress of the corrective action. The staff requests that the firm provide monthly progress reports to the Office of Compliance (using the enclosed form). Please provide customer lists and any other information requested so that the staff can monitor the effectiveness of the corrective action at various levels of the distribution chain.

Information Requested

1. Copies of all test reports, analysis, and evaluations including premarket tests and reports of tests and any analyses related to the reported problem, including the date and place such tests and analyses were conducted by or on behalf of the firm and the identity of the persons involved in the testing and analyses.
2. Copies of all complaints, claims, injury reports or safety related communications involving the product. If copies of consumer complaints and other documents requested are unavailable, indicate the reason they are unavailable and provide a summary containing the names, addresses and telephone numbers of the consumers or of the plaintiffs' attorney.
3. Copies of all safety related consumer or dealer complaints, warranty claims, and reports of injury, and copies of all documents related to such complaints, claims and injuries. Please include copies of all court complaints and related documents filed in or associated with lawsuits involving the product and a description of the resolution of those lawsuits, if any.
4. Copies of all engineering drawings, engineering change notices and material specifications relevant to the identified problem.
5. Provide 12 samples of each waffle iron manufactured by Kadee/Vitantonio. If the products have been redesigned since their initial production, please also provide samples incorporating the new design. If there is a cost associated with these samples, notify us prior to providing the samples.
6. Instructions for use of the product(s) and a catalogue depicting your full product lines.
7. A complete chronology of all events which took place from the time the firm first heard of the problem, including copies of all documents reflecting information on the date and manner in which Kadee Products Limited and/or Vitantonio Products learned of the potential problem, and the steps it took upon learning of the potential problem.
8. Please provide a detailed explanation of the relationship between Kadee Products Limited and Vitantonio Products.

9. On November 11, 1997 you provided copies of the "Vitantonio Manufacturing Return/Repair Form" for model 1600 waffle iron. Please provide an explanation of this form, specifically, explain the "Reason for Return" columns. Also, provide copies of this return/repair form for all waffle irons.
10. Do not destroy any documents or files, including computer files, concerning any waffle irons. When complying with regulations described in this letter, disclose information within the possession of Kadee Products Limited as well as Vitantonio Products. Disclose information contained on computer files as well as hard copy files.

Compliance With Reporting Obligations

Once agreement is reached on a corrective action plan and the plan is implemented, if appropriate, the staff will also investigate and assess whether it believes the firm has complied with the reporting requirements of Section 15(b) of the CPSA, 15 U.S.C. § 2064(b). That section requires every manufacturer, distributor, and retailer of a consumer product who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, or (2) creates an unreasonable risk of serious injury or death, immediately to inform the Commission of the defect, or risk, unless the firm has actual knowledge that the Commission has been adequately informed of the defect, or the risk. See 16 C.F.R. Part 1115. The CPSA makes it a prohibited act to violate the reporting requirement. Firms may be liable for a civil penalty of \$6000 for each product involved up to a maximum of \$1,500,000 for any related series of violations. Sections 15(b), 19(a)(4), 20 and 21 of the CPSA, as amended, 15 U.S.C. § 2064(b), § 2068(a)(4), § 2069 and 2070, describes the obligation of manufacturers, distributors and retailers to furnish information to the Commission and the penalties for failing to furnish such information.

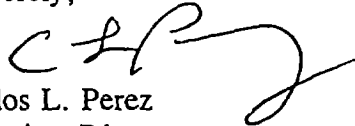
If the firm receives any information concerning other incidents or injuries, or information affecting the scope, prevalence or seriousness of the defect or hazard, it must report that information to this Office immediately. Additionally, if the firm receives information which might indicate that its corrective actions are not satisfactory in eliminating the defect or hazard or that the effectiveness of the corrective action program is less than what has been reported, it must report that information to this Office immediately.

Page 5
RP970157

The staff requests a response within 3 working days from receipt of this letter.
Please reference the CPSC file number in your response.

The staff will make every effort to work closely and cooperatively with the firm to assure a successful corrective action plan which will protect the public while at the same time create a minimum of burden and inconvenience for the firm. If you have any questions or desire assistance in responding to this letter, you may contact Zulma Soto, at: (301) 504-0608, extension 1361. To respond to this letter using the U.S. Postal Service, please address your correspondence to: Office of Compliance, U.S. Consumer Product Safety Commission, Washington, D.C. 20207-0001. For other delivery services, please address the material to: Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely,



Carlos L. Perez
Associate Director
Recalls and Compliance Division

Enclosed are:

Progress Report Form
Information Disclosure Regulation
Examples of Notification Measures

cc: Consumer Product Safety Commission
Central Regional Center
Suite 2945
230 S. Dearborn St.
Chicago, IL 60604

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TO: File
FROM: Deborah Lewis
RE: Kadee Waffle Irons
DATE: May 5, 1998

I spoke with Leeton Lee of the Walt Disney Company in California, 818-955-4724. Mr. Lee's responsibilities include running Disney's products liability section. He said that they had a problem with one batch of the Mickey Mouse Waffle Irons, and described the misplaced clip. He said they determined that the bad waffle irons were limited to a one day lot, which they sent back. They continue to sell the waffle irons. Kadee is a licensee for Walt Disney. Disney tests the waffle irons at a private electrical engineering facility. Mr. Lee said that they have tested out fine. I asked if I could have copies of those test results. He said they generally don't disclose that sort of thing, but they might be able to. He will get back to me.

Mr. Lee said several times that as far as Disney is concerned, the case is closed and the waffle irons are fine.

MODE = MEMORY TRANSMISSION

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END=MAY-13 15:03

FILE NO. = 032

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***** -301 504 0359 - ***** - 301 504 0359- *****



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Zulma Soto
Compliance Officer
Tel: 301-504-0608, ext. 1361
Fax: 301-504-0359

May 13, 1998

VIA FACSIMILE

David I. Wilson, Esq.
Arter & Hadden, LLP
1801 K Street, N.W.
Suite 400K
Washington, D.C. 20006

Re: CPSC RP970157
Kadee Products Limited/Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Mr. Wilson:

This letter confirms my receipt of your May 11, 1998 letter and our telephone conversation on May 8, 1998 concerning the above-captioned investigation.

Regarding the issues we discussed, I have the following clarification:

1. While I did state that the CPSC did not find any mis-routed wires or incorrectly installed metal clips in the two "Premier" samples provided, I did not state that the samples did not present a substantial product hazard. As I stated, I needed to consult with the staff to determine whether additional "Premier" waffle irons need to be sampled and evaluated.

A determination of whether a substantial product hazard exists is based on the Section 15 statutory criteria found under 15 U.S.C. §2064. The factors to be considered include the pattern of defect, the volume of defective products distributed in commerce, and the severity of the risk to consumers. The staff's decision to have your client resume production of its waffle irons was based solely on the fact that the two samples evaluated on Friday, May 8, 1998



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207-0001

OFFICE OF COMPLIANCE
Recalls and Compliance Division

Zulma Soto
Compliance Officer
Tel: 301-504-0608, ext. 1361
Fax: 301-504-0359

May 13, 1998

VIA FACSIMILE

David I. Wilson, Esq.
Arter & Hadden, LLP
1801 K Street, N.W.
Suite 400K
Washington, D.C. 20006

Re: CPSC RP970157
Kadee Products Limited/Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Mr. Wilson:

This letter confirms my receipt of your May 11, 1998 letter and our telephone conversation on May 8, 1998 concerning the above-captioned investigation.

Regarding the issues we discussed, I have the following clarification:

1. While I did state that the CPSC did not find any mis-routed wires or incorrectly installed metal clips in the two "Premier" samples provided, I did not state that the samples did not present a substantial product hazard. As I stated, I needed to consult with the staff to determine whether additional "Premier" waffle irons need to be sampled and evaluated.

A determination of whether a substantial product hazard exists is based on the Section 15 statutory criteria found under 15 U.S.C. §2064. The factors to be considered include the pattern of defect, the volume of defective products distributed in commerce, and the severity of the risk to consumers. The staff's decision to have your client resume production of its waffle irons was based solely on the fact that the two samples evaluated on Friday, May 8, 1998

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David I. Wilson
Page 2

did not exhibit any mis-routed wires or incorrectly installed metal clips. As I explained during our telephone conversation on Friday, May 8th, if our examination of additional samples reveal that there are mis-routed wires or incorrectly installed metal clips, the staff would again request that Kadee/Vitantonio Products stop production of the defective product line.

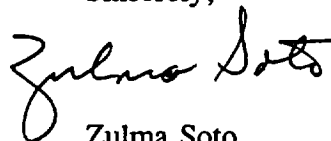
2. The staff has determined that the "Classic" waffle irons are wired differently than the "Premier" waffle iron. The "Classic" waffle irons are no longer considered part of this investigation.

The two "Premier" waffle irons evaluated on Friday, May 8th were models 1800. Please provide, by overnight mail, at least two samples each of the other "Premier" models, i.e., 1300, 1550, 1600 and 1950.

The staff is interested in resolving this matter as soon as possible, therefore, we are requesting that a response to our May 4th letter and other related issues addressed during our telephone conversations be provided as soon as possible, but no later than May 18, 1998. Please contact me if you have any questions or concerns.

Thank you for your continued cooperation in this matter.

Sincerely,



Zulma Soto
Compliance Officer



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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE
Recalls and Compliance Division
Email: cperez@cpsc.gov

Carlos L. Perez
Associate Director
Tel: 301-504-0400, Ext. 2338
Fax: 301-504-0359

HAND DELIVERED ON MAY 4, 1998

George J. Bielert, Vice President
Kadee Products Limited
6225 Cochran Road
Solon, OH 44139

Re: CPSC RP970157
Kadee Products Limited/Vitantonio Products
Kadee/Vitantonio Waffle Makers

Dear Mr. Bielert:

The staff of the Office of Compliance of the U.S. Consumer Product Safety Commission (Commission) has reviewed the available information concerning the above-mentioned case.

After careful consideration and in accordance with 16 C.F.R. § 1115.12(a), the Compliance staff has made a preliminary determination that all Kadee and/or Vitantonio waffle makers present a substantial product hazard as defined by section 15(a) of the Consumer Product Safety Act (CPSA), 15 U.S.C. § 2064(a). Specifically, the waffle makers may have mis-routed electrical wires and/or incorrectly installed metal clips resulting in abraded wires due to the sharp edge of the shell. If the abraded wires come in contact with the shell or body of the waffle maker, it presents a potential shock or electrocution hazard.

The staff welcomes and will give full consideration to any comments or additional information from the firm concerning its preliminary determination. The staff will meet with the firm as necessary to discuss its comments or corrective action.

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Voluntary Corrective Actions

In view of the substantial risk of injury presented to consumers by waffle irons with mis-routed wires and/or incorrectly installed metal clips, we request that you immediately stop production and distribution of the waffle irons. Additionally, the staff requests that the firm take voluntary action to notify consumers and to recall or correct potentially hazardous products which are in the chain of distribution and in the possession of consumers. If the firm agrees to take voluntary corrective action, please submit a written corrective action plan describing the actions which it plans to take. Section 1115.20(a) of the regulations on Substantial Product Hazard Reports, 16 C.F.R. § 1115.20(a), outlines the elements of an appropriate corrective action plan. The staff has also enclosed examples of recall actions taken by firms that the firm may find useful. The staff will review the firm's plan promptly and discuss with it any suggestions it has or additional measures it believes Kaddee Products Limited/Vitantonio Products should take.

Additionally, rather than the Commission unilaterally issuing a press release and video news release, the staff believes it would be appropriate for the firm and the Commission to issue a joint press release and video news release announcing the recall. The staff will work with the firm to develop and issue a mutually acceptable release.

A voluntary corrective action plan must include an agreement that the Commission may publicize the terms of the plan and inform the public of the nature and the extent of the alleged substantial product hazard. Please read carefully the enclosed document on "Information Disclosure" dated May 12, 1983. This document discusses the statutes and regulations which govern the Commission's disclosure of information and explains Commission staff's policy on the disclosure of information concerning product recalls and similar actions.

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Information Requested

1. Copies of all test reports, analysis, and evaluations including premarket tests and reports of tests and any analyses related to the reported problem, including the date and place such tests and analyses were conducted by or on behalf of the firm and the identity of the persons involved in the testing and analyses.
2. Copies of all complaints, claims, injury reports or safety related communications involving the product. If copies of consumer complaints and other documents requested are unavailable, indicate the reason they are unavailable and provide a summary containing the names, addresses and telephone numbers of the consumers or of the plaintiffs' attorney.
3. Copies of all safety related consumer or dealer complaints, warranty claims, and reports of injury, and copies of all documents related to such complaints, claims and injuries. Please include copies of all court complaints and related documents filed in or associated with lawsuits involving the product and a description of the resolution of those lawsuits, if any.
4. Copies of all engineering drawings, engineering change notices and material specifications relevant to the identified problem.
5. Provide 12 samples of each waffle iron manufactured by Kadee/Vitantonio. If the products have been redesigned since their initial production, please also provide samples incorporating the new design. If there is a cost associated with these samples, notify us prior to providing the samples.
6. Instructions for use of the product(s) and a catalogue depicting your full product lines.
7. A complete chronology of all events which took place from the time the firm first heard of the problem, including copies of all documents reflecting information on the date and manner in which Kadee Products Limited and/or Vitantonio Products learned of the potential problem, and the steps it took upon learning of the potential problem.
8. Please provide a detailed explanation of the relationship between Kadee Products Limited and Vitantonio Products.

9. On November 11, 1997 you provided copies of the "Vitantonio Manufacturing Return/Repair Form" for model 1600 waffle iron. Please provide an explanation of this form, specifically, explain the "Reason for Return" columns. Also, provide copies of this return/repair form for all waffle irons.
10. Do not destroy any documents or files, including computer files, concerning any waffle irons. When complying with regulations described in this letter, disclose information within the possession of Kadee Products Limited as well as Vitantonio Products. Disclose information contained on computer files as well as hard copy files.

Compliance With Reporting Obligations

Once agreement is reached on a corrective action plan and the plan is implemented, if appropriate, the staff will also investigate and assess whether it believes the firm has complied with the reporting requirements of Section 15(b) of the CPSA, 15 U.S.C. § 2064(b). That section requires every manufacturer, distributor, and retailer of a consumer product who obtains information which reasonably supports the conclusion that the product (1) contains a defect which could create a substantial product hazard, or (2) creates an unreasonable risk of serious injury or death, immediately to inform the Commission of the defect, or risk, unless the firm has actual knowledge that the Commission has been adequately informed of the defect, or the risk. See 16 C.F.R. Part 1115. The CPSA makes it a prohibited act to violate the reporting requirement. Firms may be liable for a civil penalty of \$6000 for each product involved up to a maximum of \$1,500,000 for any related series of violations. Sections 15(b), 19(a)(4), 20 and 21 of the CPSA, as amended, 15 U.S.C. § 2064(b), § 2068(a)(4), § 2069 and 2070, describes the obligation of manufacturers, distributors and retailers to furnish information to the Commission and the penalties for failing to furnish such information.

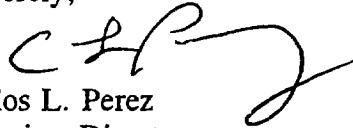
If the firm receives any information concerning other incidents or injuries, or information affecting the scope, prevalence or seriousness of the defect or hazard, it must report that information to this Office immediately. Additionally, if the firm receives information which might indicate that its corrective actions are not satisfactory in eliminating the defect or hazard or that the effectiveness of the corrective action program is less than what has been reported, it must report that information to this Office immediately.

Page 5
RP970157

The staff requests a response within 3 working days from receipt of this letter.
Please reference the CPSC file number in your response.

The staff will make every effort to work closely and cooperatively with the firm to assure a successful corrective action plan which will protect the public while at the same time create a minimum of burden and inconvenience for the firm. If you have any questions or desire assistance in responding to this letter, you may contact Zulma Soto, at: (301) 504-0608, extension 1361. To respond to this letter using the U.S. Postal Service, please address your correspondence to: Office of Compliance, U.S. Consumer Product Safety Commission, Washington, D.C. 20207-0001. For other delivery services, please address the material to: Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely,



Carlos L. Perez
Associate Director
Recalls and Compliance Division

Enclosed are:

Progress Report Form
Information Disclosure Regulation
Examples of Notification Measures

cc: Consumer Product Safety Commission
Central Regional Center
Suite 2945
230 S. Dearborn St.
Chicago, IL 60604

201

MODE = MEMORY TRANSMISSION

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END=SEP-30 16:21

FILE NO. = 199

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-CPSC COMPLIANCE -

***** -301 504 0359 - ***** - 301 504 0359- *****

198



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

DIVISION OF
CORRECTIVE ACTIONS
FAX: 301-504-0359

Tel: 301-504-0608

DATE: 9/30/97 PAGES TRANSMITTED 1 + cover

TO: George Bielert

TITLE: Vice President

OFFICE: _____

FAX #: 216-519-1401

FROM: Zulema Soto

REMARKS: As per your request, enclosed
find a discussion of our examination
of the samples you provided. Please call me tomorrow
to discuss.

☐ Confirmation copy to follow by U.S. Mail

☒ Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.

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Discussion

The sample sent from G. Bielert with the words, "Wire routed under cover edge, not under protector clip" was opened and examined. The location of the mis-routed wire does not protect it from abrasions. If the insulation becomes nicked or scraped due to its improper location, the abrasion could allow line voltage to energize the entire surface of the waffle iron if it is not plugged into a properly grounded receptacle. If the product is being used with a "cheater" plug or in a home without a ground plug there is a possibility of an electrocution if a consumer touched the product and a grounded surface. The surface of the waffle iron is made of all metal and the entire product would become energized if it is not plugged into a properly grounded receptacle.

An examination of the "fix" sent by G. Bielert with the words, "Confirming wiring routing under clip" was opened and examined. The wire in question with the initial sample was properly routed and an abrasion would not occur. However, the sample was opened and another wire, directly from the hot conductor of the cord to the heating element, was found mis-routed between two metal surfaces. Microscopic examination shows that the insulation deteriorated and the line conductor came in contact with the surface of the waffle iron and an arc developed. A similar hazard scenario exists if the insulation became nicked and the line conductor came in contact with surface as with the other mis-routed wire.

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U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE

Division of
Corrective Actions
Tel: 301-504-0608
Fax: 301-504-0359

JUN 06 1997

Certified Mail/Telecopy: (216) 519-1401

George J. Bielert
Vice President
Kadee Products Limited
6225 Cochran Road
Solon, OH 44139

Re: CPSC RP970157
Kadee Products Limited
Mickey Mouse Waffler

Dear Mr. Bielert:

Thank you for your report dated May 19, 1997 under section 15(b) of the Consumer Product Safety Act, as amended (CPSA), 15 U.S.C. § 2064(b). In your report, you identified a potential problem with a "Mickey Mouse Waffler". You indicated that a misrouted wire exhibited abrasion of the insulation resulting in contact of the conductor and the metal casing. This problem presents a potential shock hazard.

You also noted that the firm may participate in the Commission's No Preliminary Determination (No PD) Program described in the Federal Register, August 17, 1995. Information concerning the Program was faxed to you on June 5, 1997. The essential part of the Program is that all of the information needed by the staff to evaluate and approve a firm's corrective action plan (CAP), including the information requested for a full report at 16 C.F.R. § 1115(13) and all draft notice material, must be submitted in time for review and approval so that the CAP can be announced in 20 working days from the date of the initial report. Please contact Ms. Zulma Soto as soon as possible and notify her of your decision to participate in the No PD Program.

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In order to facilitate the staff's review, please provide needed information by telephone or telefax as soon as you receive it. If you seek assistance or if you have any questions, you may contact Zulma Soto, telephone: (301) 504-0608, extension 1361. For all overnight and/or direct delivery services, please address the material to: Division of Corrective Actions, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely,



Marc J. Schoem
Director
Division of Corrective Actions

cc: Consumer Product Safety Commission
Central Regional Center
Suite 2945
230 S. Dearborn St.
Chicago, IL 60604

A Samples evaluated by Julie

97-793-0309 - 2 subs PSA
QR0033.97

- ① Model 1950C - sub. 1
Serial # 17002122
"Conforming wiring routing under clip"
- ② Model 1950C - sub. 2
Serial # 17002649
"Wire routed under cover edge
not under protector clip"

B Sample evaluated by Aaron

98-830-4327 - 2 subs

- ① Model 1950
Serial # 16019543 - No problem
- ② Model 1950
Serial # 37005339 - PSA 0105.98
found improperly installed clip